

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re TREMONT SECURITIES LAW,
STATE LAW AND INSURANCE LITIGATION

This Document Relates To:

INSURANCE ACTION, 09-cv-557

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Master Docket Number
1:08-cv-11117-TPG

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CLASS ACTION

**DECLARATION OF GLEN L. ABRAMSON IN SUPPORT
OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF PARTIAL SETTLEMENT
AND MOTION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES**

I, GLEN L. ABRAMSON, declare as follows:

1. I am a shareholder of Berger & Montague, P.C. ("Berger & Montague") and an attorney in good standing in the Commonwealth of Pennsylvania.

2. Berger & Montague currently represents 29 trusts and/or corporations (referred to in the Stipulation of Settlement as the "Individual Settling Insurance Plaintiffs") that collectively own 32 variable life insurance policies issued by Argus International Life Bermuda Ltd.

("Argus") or its predecessors and invested in the Rye Select Broad Market Insurance Portfolio IDF and/or the Rye Select Broad Market XL Portfolio, Ltd (the "Settling Insurance Funds").

The Individual Settling Insurance Plaintiffs are the plaintiffs in *The Lugano Trust et al v.*

Tremont Capital Management, Inc., et al, 1:09-cv-06840-TPG, which has been consolidated with the Insurance Actions.

3. Each of the 29 Individual Settling Insurance Plaintiffs, on behalf of all 32 policies owned by them, have agreed to participate in the Settlement. Collectively, the policies owned by

the Individual Settling Parties represent more than 50% of potential Recognized Claims in the Settling Insurance Funds under the Insurance Plan of Allocation for variable life insurance or variable annuity policies which could have potentially been included in the class (e.g. – not including Tremont employees who have been excluded from the class).

4. Berger & Montague and Insurance Co-Lead Counsel have agreed to share any attorneys' fees that may be awarded by the Court and received by Berger & Montague in connection with its representation of the Individual Settling Insurance Plaintiffs in a manner they believe reasonably compensates each of them for their respective efforts in this case. Since the inception of the case, Berger & Montague's lodestar in developing and prosecuting claims against both Argus and the Settling Defendants is \$1,491,261.00 as of March 31, 2011.

5. In addition, pursuant to an agreement with Insurance Co-Lead Counsel, Berger & Montague is seeking from the Insurance Settlement Fund unreimbursed expenses totaling \$30,700.78 since the inception of the case, as follows:

Disbursement	Total
Telephone	\$100.18
Reproduction Costs (copying, printing, scanning)	753.63
Travel	1,656.04
Computer Research	2,067.52
Mediation consulting fees	1,639.31
Expert fees (Foreign legal counsel)	24,484.10
TOTAL:	\$30,700.78

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

EXECUTED this 4th day of May, 2011.

A handwritten signature in blue ink, appearing to read "Glen L. Abramson", is written over a horizontal line.

GLEN L. ABRAMSON